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July 9, 2014

Via Electronic Filing

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte *In the Matters of Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353; Protecting and Promoting the Open Internet, GN Docket No. 14-28*

Dear Ms. Dortch:

On Wednesday, July 9, 2014, Paul Plofchan, ADT Vice President for Government and Regulatory Affairs, along with Alex Hecht and Rachel Sanford of ML Strategies, met with Nicholas Degani of Commissioner Pai's office.

Mr. Plofchan provided background information about ADT Security Services and the alarm industry's interest in the IP Transition. Specifically, communications services intended to replace POTS (plain old telephone service) must meet certain technical criteria, and testing of alarm functionality and line seizure by the telecommunications provider are necessary and critical life safety components of any new communications service installation. To that end, proper testing and data collection regarding post installation alarm functionality should be incorporated into the Technology Transitions trials.

The alarm industry also continues to work with IP communications service providers to develop technical agreements for all IP technologies that base their communications on Managed Facilities-Based Voice Network (MFVN) standards. This effort will help ensure alarm monitoring systems that are already in place to protect consumers' homes and businesses have the necessary system functionality to transmit alarm signals from the protected location to the monitoring center.

Regarding the Open Internet, public safety and lifesaving services such as home alarm systems and school and business security must travel across the broadband network without the threat of de-prioritization. Alarm and other life safety home automation signaling consist of small, discrete packet types transmitted from the customer's alarm location, across the network(s), to

the monitoring center in a matter of seconds. The associated carrying costs are de minimis and do not generate an incentive to de-prioritize this traffic.

Sincerely,

Rachel Sanford

Cc: Nicholas Degani